

Roman Nikhman, Esq.
Nevada Bar No. 15444
Nikhman Law Firm PLLC
3960 Howard Hughes Pkwy, Suite 500
Las Vegas, Nevada 89169
Telephone: (702) 550-9068
Email: esq@nikhman.com

*Attorney for Defendant/Counter-Claimant
Nataliya Nova LLC*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THE BUREAU FASHION WEEK LLC, a
South Carolina limited liability company;
THE SOCIETY FASHION WEEK LLC, a
South Carolina limited liability company,

Plaintiffs/
Counter-Defendants,

v.

NATALIYA NOVA LLC, a Nevada limited
liability company,

Defendant/
Counter-Claimant.

CASE NO.: 2:24-cv-00233-GMN-EJY

**JOINT STIPULATION AND ORDER TO
EXTEND THE JOINT PRETRIAL
ORDER DEADLINE**

(FIRST REQUEST)

Defendant/Counter-Claimant Nataliya Nova LLC (“Counter-Claimant”), by and through its counsel of record, Nikhman Law Firm PLLC, and Plaintiffs/Counter-Defendants The Bureau Fashion Week LLC and The Society Fashion Week LLC’s (“Counter-Defendants”; collectively with Counter-Claimant, the “Parties”), by and through their counsel of record, Omni Legal Group, hereby submit this Stipulation and Order to Extend the Joint Pretrial Order Deadline.

I. PROCEDURAL BACKGROUND

Counter-Defendants filed the instant action on February 2, 2024 (ECF No. 1). Counter-Plaintiff filed its Answer and Counterclaim on April 16, 2024 (ECF No. 24). Counter-Plaintiff filed its First Amended Answer and Counterclaim on May 6, 2024 (ECF No. 26). The Joint

1 Discovery Plan and Scheduling Order was filed on July 11, 2024 (the “Scheduling Order”; ECF
2 No. 35). Pursuant to the Scheduling Order, the Parties were required to submit a Joint Pretrial
3 Order by February 5, 2024, which was 30 days after the dispositive motion deadline. The Parties
4 have fully completed their respective discovery, which included several sets of written discovery,
5 depositions of percipient witnesses and subpoenaed documents. Indeed, the Parties do not intend
6 to extend any discovery-related deadline apart from the Joint Pretrial Order deadline. In
7 preparation for the Settlement Conference ordered by this Court (ECF No. 62), the Parties have
8 elected to participate in a pre-settlement conference on March 4, 2025. Given the pendency of
9 various motions that are still before this Court, namely ECF Nos. 27, 41, 43, 55 and 59, as well
10 as the upcoming pre-settlement conference, the Parties request that the Joint Pretrial Order
11 deadline be extended to March 15, 2025.

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II. STIPULATION

To clarify a previously submitted stipulation (ECF No. 64), the Parties stipulate and agree to extend only the Joint Pretrial Order deadline to March 25, 2025. This is the Parties' first request to extend such deadline and is not made for any deleterious purposes or to unnecessarily delay these proceedings. Rather, the Parties seek this extension to participate in the pre-settlement conference in good faith.

Dated this 13th day of February, 2025.

Nikhman Law Firm PLLC

Omni Legal Group

/s/ Roman Nikhman

/s/ Omid E. Khalifeh¹

Roman Nikhman, Esq.
Nevada Bar No. 15444
3960 Howard Hughes Pkwy, Suite 500
Las Vegas, Nevada 89169
Telephone: (702) 550-9068
Email: esq@nikhman.com

Omid E. Khalifeh
California Bar No. 347801 (*pro hac vice*)
2029 Century Park East, Suite 438
Los Angeles, California 90067
Telephone: (310) 276-6664
Email: omid@omnilg.com

*Attorney for Defendant/Counter-
Claimant Nataliya Nova LLC*

*Attorney for Plaintiffs/Counter-Defendants
Bureau Fashion Week LLC and Society
Fashion Week LLC*

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

Dated: February 13, 2025

¹ Electronic signature affixed with permission.